

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DEBORAH R. BEATON,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.; and
NORTHWEST TRUSTEE SERVICES, INC.,

Defendants.

No. 11-CV-872-RAJ

**DECLARATION OF COUNSEL,
HEIDI E. BUCK, IN SUPPORT OF
DEFENDANT NORTHWEST
TRUSTEE SERVICES, INC.'S REPLY
TO PLAINTIFF'S RESPONSE TO
NORTHWEST TRUSTEE'S JOINDER
IN DEFENDANT JPMORGAN CHASE
BANK, N.A.'S MOTION TO DISMISS
PLAINTIFF'S [FIRST] AMENDED
COMPLAINT FOR DAMAGES**

Heidi E. Buck declares as follows:

1. I am the attorney for Defendant Northwest Trustee Services, Inc. ("Northwest Trustee") herein and am competent to testify in the above-entitled action, and have personal knowledge of the matters referred to herein.

2. Prior to filing the response to the pending Motion to Dismiss and Joinder on February 3, 2012, alleging Defendants had refused to participate in discovery, Plaintiff made no attempt to contact my office in regard to the apparent outstanding discovery responses.

3. At no time has Plaintiff made any attempt to meet and confer in regard to Plaintiff's apparent discovery requests.

